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February 15, 2002

David Waddell  
Executive Secretary  
Tennessee Regulatory Authority  
460 James Robertson Parkway  
Nashville, TN 37243

VIA HAND DELIVERY

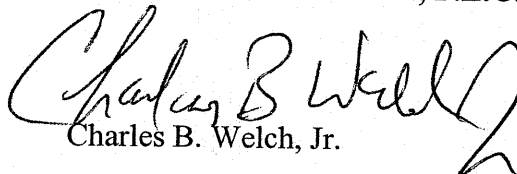
Re: *Generic Docket to Establish Generally Available Terms and Conditions For  
Interconnection, Docket No. 01-00526*

Dear Mr. Waddell:

Enclosed please find an original and 13 copies of the Comments of Time Warner Telecom of the Mid-South, L.P., XO Communications, Inc., MCI WorldCom, Inc., and The Southeast Competitive Carriers Association in accordance with the Order of the Tennessee Regulatory Authority in the above-referenced docket. I have provided copies to all parties of record.

Very truly yours,

**FARRIS, MATHEWS, BRANAN,  
BOBANGO & HELLEN, P.L.C.**

  
Charles B. Welch, Jr.

CBW:lw

Enclosures

cc: All Parties of Record

**BEFORE THE TENNESSEE REGULATORY AUTHORITY  
NASHVILLE, TENNESSEE**

In Re: Generic Docket to Establish	)	
Generally Available Terms and Conditions	)	Docket No. 01-00526
for Interconnection	)	
	)	

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**COMMENTS FILED ON BEHALF OF TIME WARNER TELECOMMUNICATIONS  
OF THE MID-SOUTH, L.P., XO COMMUNICATIONS, INC., MCI WORLDCOM, INC.,  
and THE SOUTHEAST COMPETITIVE CARRIERS ASSOCIATION**

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Time Warner Telecom of the Mid-South LP ("Time Warner"), XO Communications, Inc., ("XO"), MCI WorldCom, Inc. ("MCI"), and The Southeast Competitive Carriers Association ("SECCA"), advise the Authority that they will not be filing comments relevant to the substantive provisions of the BellSouth Telecommunications, Inc. Modified Interconnection Agreement filed on January 25, 2002, due to lack of sufficient time and resources necessary to prepare such comments. These parties sincerely appreciate the Authority's efforts to expedite this very important docket which is critical to the availability of fair and equitable interconnection terms and conditions necessary to the development of competitive markets.

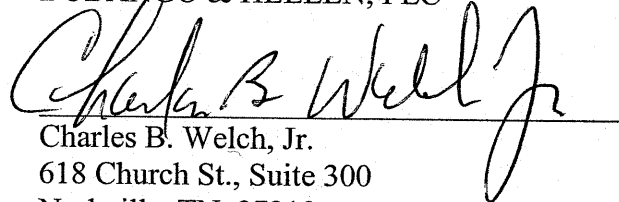
These parties suggest that the Authority continue its efforts to develop generic interconnection arrangements, either in this docket or in a new docket created for that purpose, even after a satisfactory BellSouth document is approved in this proceeding. The CLEC industry feels that there are a number of good reasons to support the concept of an on-going process to develop and refine available interconnection arrangements. First, and probably foremost, technology is constantly changing and the markets are extremely volatile. Second, interconnection agreements are voluminous and, for the most part, extremely technical documents which deal with the complexities of network operations. Due to the nature of these documents, a competent review of their terms necessarily requires the participation of subject

matter experts who are not always immediately available to represent their companies in the regulatory arena. These experts are located in various parts of the country and generally are assigned network responsibilities in a number of states. For this reason, a more deliberate review process such as a workshop is warranted.

Recently, members of the CLEC industry have committed their resources to a more cooperative approach in defining local interconnection issues and advocating acceptable generic solutions which should work to resolve problems between CLECs and ILECs. The industry members in Tennessee encourage the Authority to continue to provide a forum for this evolving process.

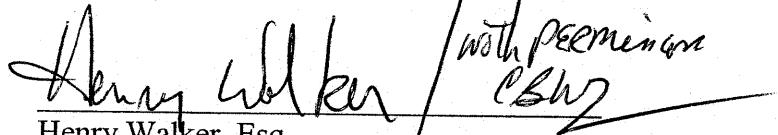
Respectfully submitted,

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**CERTIFICATE OF SERVICE**

The undersigned certifies that a copy of the foregoing has been hand delivered or mailed to the following persons on this the 15<sup>th</sup> day of February, 2002.

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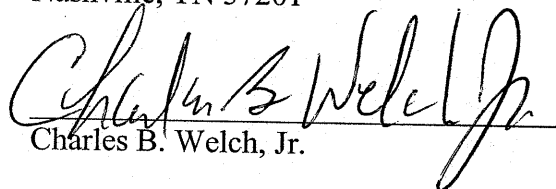
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